

**NESHAP Case Development Summary Document -**  
**Project Development Group, Inc.**

**I. Project Development Group, Inc.**

102 Technology Lane  
Export, PA 15632  
Phone:  
EPA Case No.: N-2003-137  
EPA Docket No.: CAA-03-2004-0009

**II Inspection Summary:**

Project Development Group, Inc. is in violation of NESHAP notification requirements under 40 C.F.R. § 61.145(b)(3)(i). NESHAP requirements state that asbestos abatement notifications must be postmarked or delivered at least ten (10) working days before the project is to begin. No inspections were performed by EPA or the State.

**III. Compliance History:**

This is a second NESHAP violation for Project Development Group, Inc. within the last three (3) years. The first violation occurred in March of 2001 and they received a Notice of Warning (#N-2001-30) in June of 2001 for submitting an asbestos notification two (2) working days before the start date of a renovation project, a violation of NESHAP regulation 40 C.F.R. § 61.145(b)(3)(i).

**IV. Ownership Information:**

The notification was submitted to EPA by Project Development Group, Inc., and therefore, it was their responsibility to make sure it was postmarked ten (10) working days before the start of the asbestos abatement project.

**V. Financial Status of Facility Owner /Operator:**

According to its Dun & Bradstreet report, Project Development Group, Inc. is a corporation/subsidiary of Pdg Environmental, Inc. of Pittsburgh, PA, and is a contractor specializing in asbestos abatement contracting and environmental remediation (100%). Pdg does business throughout the United States with commercial concerns, industrial institutions and government agencies. Annual sales figures for the Pdg in entirety as of 1/31/1999 was \$36,828,000. The president of the company is John Regan.

**VI. Detailed Description of Violations:**

Project Development Group, Inc. is in violation of 40 C.F.R. § 61.145(b)(3)(i), which states that notifications need to be postmarked or delivered ten (10) **working** days before the start of an asbestos abatement project. Specifically, the asbestos project notification was for an asbestos renovation project at US Steel in Clairton, PA. The project was to **begin on November 21, 2002** and **conclude on December 20, 2002**. The notification needed to be postmarked by November 7, 2002, to fulfill the NESHAP requirement, however, it was **postmarked on November 12, 2002**. Subsequently, the notice was mailed seven (7) working days before the project was to begin.

**VII. Penalty Calculation and Justification:**

The penalty calculated for this violation is \$220. Section C1 of Appendix III for the Asbestos Demolition and Renovation Civil Penalty Policy states that "a 'second' or 'subsequent' violation should be determined to have occurred if, after being notified of a violation by the local agency, State or EPA at a prior demolition or renovation project, the owner or operator violates the Asbestos NESHAP regulations during another project. This prior notification could range from simply an oral or written warning...." The penalty policy also states under Section A2 that "where the notification is late, the Region should use the figures in the chart, but has discretion to insert appropriate figures in circumstances not addressed by the matrix." Region III feels that the penalty amount of \$200 found in the matrix is appropriate at this time. In accordance with 40 C.F.R. Part 19, entitled Adjustment to Civil Monetary Penalties for inflation, the penalty has been adjusted to \$220.

**Attachment 1****VIII. Injunctive Relief Sought**

Not applicable.